



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**VIA FIRST CLASS MAIL**

Curtis S. Root, Treasurer  
Henry Lewis for Congress LLC

**FEB 27 2016**

Bradenton, FL 34209

RE: MUR 6903  
Henry Lawrence for Congress LLC and  
Curtis S. Root in his official capacity as  
treasurer

Dear Mr. Root:

On February 18, 2016, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you on behalf of Henry Lawrence for Congress LLC and Curtis S. Root in his official capacity as treasurer, in settlement of a violation of 52 U.S.C. § 30104(a) and (b) of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of your client and the Commission. See 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Camilla Jackson Jones  
Attorney

Enclosure  
Conciliation Agreement

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1. The first step is to identify the problem or issue that needs to be addressed.

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filed its first disclosure report with the Commission, the 2014 July Quarterly Report, on July 14, 2014. Neither the Committee's 2014 July Quarterly Report nor any of its subsequent reports disclosed receipts or disbursements received or made before April 1, 2014.

2. The Federal Election Campaign Act of 1971, as amended (the "Act"), requires a candidate's authorized committee to disclose all receipts and disbursements, including all contributions and expenditures. 52 U.S.C. § 30104(a), (b). The Act defines a "contribution" as "any gift, subscription, loan, advance, or deposit of money or anything of value made by any persons for the purpose of influencing any election for Federal Office."

52 U.S.C. § 30101(8)(A)(i). An "expenditure" is defined as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(9)(A)(i); 11 C.F.R. § 100.111.

3. An individual becomes a "candidate" for Federal office when his or her campaign either receives or makes \$5,000 in contributions or expenditures.

52 U.S.C. § 30101(2). Once an individual becomes a candidate for the House of Representatives, his or her principal campaign committee must file quarterly reports. 11 C.F.R. § 104.5(a). That first report must include the actual dates and amounts of all receipts and disbursements made before the filing of the report, even if they did not occur during the reporting period covered by the report. 11 C.F.R. §§ 100.5, 104.3(a), (b).

4. As part of this obligation, the authorized committee must identify any person who makes a contribution to the committee that exceeds \$200 or aggregates to over \$200 within the election cycle, or any lesser amount if the committee elects, together with the date and amount of the contribution. 52 U.S.C. § 30104(b)(3). The Act also requires an authorized

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committee to itemize all disbursements, including operating expenditures, that exceed \$200 or aggregate to over \$200 when added to other disbursements in the same category and made to the same payee during the election cycle, and include the date, amount, and purpose of the operating expenditure. 52 U.S.C. § 30104(b)(4)-(5); 11 C.F.R. § 104.3(b)(4)(i), (vi).

5. The Committee failed to file a 2014 April Quarterly Report, even though it had receipts and disbursements that exceeded \$5,000 prior to April 1, 2014. The Committee failed to timely disclose a total of \$3,075 in receipts and \$12,639.94 in disbursements received and made prior to April 1, 2014. Moreover, while the Committee disclosed some of these receipts and disbursements in its 2014 Pre-Primary Report, they were inaccurately reported as having occurred on July 1, 2014.

6. In its 2014 Pre-Primary Report, the Committee disclosed five contributions totaling \$2,100 of the \$3,075 that it received prior to April 1, 2014, but inaccurately reported July 1, 2014 as the date of receipt. The Committee never disclosed the remaining \$975 in receipts.

Contributor	Contribution Amount	Actual Date of Receipt	Disclosed Date of Receipt
Mr. Bradenton	\$1,000	1/10/14	7/1/14
Martin Rafferty	\$300	2/18/14	7/1/14
Clint Gharib	\$250	2/20/14	7/1/14
W. Stuart Gregory	\$300	2/25/14	7/1/14
Richard Anderson	\$250	3/4/14	7/1/14

7. Similarly, in its 2014 Pre-Primary Report, the Committee disclosed six disbursements that account for \$11,409.63 of the \$12,639.94 in disbursements that the Committee made before April 1, 2014, but inaccurately reported July 1, 2014 as the date of

payment. The Committee never disclosed the remaining \$1,230.31 in disbursements.

Payee	Expenditure Amount	Actual Date of Payment	Disclosed Date of Payment
American Jewish Committee	\$250	3/12/14	7/1/14
Cartier Winning Images	\$10,000	1/10/14	7/1/14
Mars Vision Productions	\$216	2/18/14	7/1/14
Nationbuilder	\$542	2/25/14	7/1/14
Quad Systems, Inc.	\$151.63	3/5/14	7/1/14
Sarasota Democratic Party	\$250	2/23/14	7/1/14

V. Respondent violated 52 U.S.C. § 30104(a) by failing to file its 2014 April Quarterly Report. Respondent also violated 52 U.S.C. § 30104(b) by reporting inaccurate dates for receipts and disbursements on its 2014 Pre-Primary Report.

VI. 1. Respondent will pay a civil penalty to the Commission in the amount of Three Thousand Dollars (\$3,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will file its 2014 April Quarterly Report and make any appropriate amendments to its other disclosure reports to correct the public record.

3. Respondent will cease and desist in committing violations of 52 U.S.C. § 30104(a), (b).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this agreement

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becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained within this written agreement shall be enforceable.

FOR THE COMMISSION:

BY: Kathleen Guith  
Kathleen Guith  
Acting Associate General Counsel  
for Enforcement

2/24/16  
Date

FOR THE RESPONDENT:

Curtis S. Root  
Curtis S. Root  
Treasurer

1/29/16  
Date